

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

NOTICE OF FILING

PLEASE TAKE NOTICE that on September 04, 2008, there was filed with the Clerk of the United States District Court, Northern District of Illinois, Eastern Division, the Joint Report of the Parties' Planning Meeting, copies of which are attached and hereby served upon you.

Respectfully submitted,

/s/ Alejandro Caffarelli
Attorney for Plaintiff

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**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JOINT REPORT OF THE PARTIES' PLANNING MEETING

1. Pursuant to Fed.R.Civ.P.26(f), a meeting was held on August 12, 2008 in the offices of Caffarelli & Siegel Ltd. and was attended by:

Alejandro Caffarelli for plaintiff
James Convery for defendant

2. Pre-Discovery Disclosures. The parties will exchange by September 15, 2008 the information required by Fed.R.Civ.P.26(a)(1).

3. Discovery Plan. The parties jointly propose to the court the following discovery plan:

Discovery shall encompass all areas relevant to the claims and affirmative defenses, including medical records, personnel documents, mitigation, FMLA policies and procedures, and facts underlying the allegations in the pleadings. The parties anticipate that electronic discovery will not be necessary at this time, other than e-mail correspondence and electronic copies of any data or policies relevant to the claims, which the parties anticipate can be produced in paper format. All discovery shall be commenced so as to be completed by January 31, 2009.

The parties do not expect to exceed the number of depositions permitted under the Federal Rules of Civil Procedure.

The parties do not anticipate expert testimony.

Supplements under Rule 26(e) shall be due 45 days prior to close of discovery.

4. Other Items.

The parties request a final pretrial conference 90 days after the close of discovery, and the Pretrial Order shall be due 75 days after the close of discovery, unless a motion for

summary judgment is filed, in which case the pretrial dates will be scheduled following disposition of the motion for summary judgment, if necessary..

Plaintiff should be allowed until November 1, 2008 to join additional parties and until the same date to amend the pleadings.

Defendant should be allowed until December 1, 2008 to join additional parties and until the same date to amend the pleadings.

All potentially dispositive motions should be filed by one (1) month after the close of general discovery.

The Plaintiff has made a settlement proposal, and the parties are in the process of discussing settlement.

Final lists of witnesses and exhibits under Rule 26(a)(3) should be due:
from plaintiff(s) by 14 days prior to the Pretrial Order.

from defendant(s) by 7 days prior to the Pretrial Order.

Parties should have until the date the Pretrial Order is due to list objections under Rule 26(a)(3).

The parties are currently discussing whether they will consent to the general jurisdiction of the assigned magistrate judge.

The parties anticipate that the trial will last approximately 3-4 days.

Dated: September 4, 2008

Respectfully submitted,

FOR PLAINTIFF(S)

/s/ Alejandro Caffarelli
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FOR DEFENDANT

/s/ James Convery
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Laner Muchin
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CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that he caused a copy of the attached, Joint Report of the Parties' Planning Meeting, to be served upon the parties listed below via the electronic filing system for the United States District Court for the Northern District of Illinois, on September 4, 2008.

James Convery
Laner Muchin
515 N. State St., Ste. 2800
Chicago, IL 60610

Courtesy copy delivered the same day to the courtroom deputy of Judge Guzman via hand delivery.

/s/ Alejandro Caffarelli
Alejandro Caffarelli
Caffarelli & Siegel Ltd.
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